

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§ § § §	Case No. 22-60043
FREE SPEECH SYSTEMS, LLC,	§ § § §	Chapter 11 Subchapter V
Debtor.		

**THE TEXAS PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR HEARING
SCHEDULED FOR SEPTEMBER 13, 2022 AT 1:00 P.M.**

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, “**Texas Plaintiffs**”), creditors and parties-in-interest in the above-captioned case, file their Witness and Exhibit List for the hearing to be held on September 13, 2022, at 1:00 p.m. (prevailing Central Time) as follows:

WITNESSES

The Sandy Hook Plaintiffs may call the following witnesses at the Hearing:

1. Jarrod B. Martin.
2. Any witness called or designated by any other party.
3. Any witness necessary to rebut the evidence or testimony of any witness offered or designated by any other party

EXHIBITS

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1.	Email chain (September 2 – September 8, 2022) regarding PQPR Discovery [ECF 137-3]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
2.	Second Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [ECF 98]						
3.	Any document or pleading filed in the above-captioned main cases						
4.	Any exhibit necessary for impeachment and/or rebuttal purposes						
5.	Any exhibit identified or offered by any other party						

RESERVATION OF RIGHTS

The Sandy Hook Plaintiffs reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

Dated: September 12, 2022

McDOWELL HETHERINGTON LLP

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Counsel for the Texas Plaintiffs

AND

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, PC**

By: /s/ Jarrod B. Martin

Jarrod B. Martin

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Bankruptcy Counsel for the Texas Plaintiff

Certificate of Service

I certify that on September 12, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jarrod B. Martin

Jarrod B. Martin